

MAY 0 6 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

US EPA RECORDS CENTER REGION 5



468528

Mr. Joseph A. Heimbuch
36345 Van Born Road
Romulus, Michigan 48174

Re: REQUEST TO SHOW CAUSE
Chemical Recovery Systems, Inc.,
Elyria, Ohio

Dear Mr. Heimbuch:

Per your request, enclosed please find copies of reports detailing the analytical results of samples collected by the United States Environmental Protection Agency (U.S. EPA) at the Chemical Recovery Systems, Inc. (hereinafter "CRS") facility in Elyria, Ohio. Additionally, for your benefit, the concerns of the U.S. EPA as originally communicated to CRS in the Agency's Request to Show Cause are set forth herein with greater particularity. The numbered paragraphs below correspond to the problem areas listed in the show cause request.

1. The leaching of chemical substances from Chemical Recovery Systems, Inc. property into the Black River.

Personnel from the U.S. EPA have observed a leachate oozing into the river from CRS property. It is the U.S. EPA's position that said leaching into the river must cease immediately.

2. The emission of vapors and fumes from distilling operations at unacceptable health and explosive limits.

Information collected by a State agency with the use of portable combustible hydrocarbon analyzers in and around the distilling operations has revealed that vapor concentrations reach levels within the explosive range. Inspectors from the U.S. EPA have observed that faulty relief valves, rupture discs and other connections in the stills as well as chemical spillage and the presence of open chemical tanks within the still buildings combine to release vapors and fumes at concentrations which create an imminent fire hazard to both the employees of the facility and the neighboring community.

3. The placement of drums and/or containers on CRS property at positions where there is a reasonable likelihood that said drums and/or containers are liable to be deposited into the Black River.

Self-explanatory.

4. The improper venting, grounding and diking of storage tanks containing solid wastes and/or hazardous wastes on CRS property.

Self-explanatory.

5. The processing of received hazardous materials in a manner which creates an imminent and substantial fire hazard and explosion hazard at the site.

The transfer of spent solvents into the distillation units is done improperly and carelessly resulting in a great deal of ground spillage. Transfer is not through rigid closed piping systems. Transfer containers are not equipped with self-closing valves. Containers are not electrically bonded or grounded during the transfer of combustible and flammable liquids. Diesel engines and electric pumps are operated in close proximity to the stills. Chemical spills have contaminated the ground with flammable materials as well as other hazardous chemicals such as poly-chlorinated biphenyls (PCBs). Chemical drums reported to U.S. EPA inspectors as being empty by CRS personnel were in fact found to be one third to one-half full upon sounding. Leaking of chemicals from rusted, damaged drums stored on the site has been observed. The absence of product information on the drums stored on site makes it impossible to determine whether flammable and combustible liquids are properly segregated from hazardous materials or chemicals in accordance with National Fire Protection Association standards. The facility is not totally secure from public access and warning signs revealing the nature and location of hazardous materials are not posted.

I shall expect to hear from you within a day or two of your receipt of this letter as promised in our telephone conversation to arrange a date to Show Cause. I also remind you that the information requested from CRS in the Informational Request is now due. That information has not yet been received.

If you have any questions please do not hesitate to call.

Very truly yours,

George D. Phelus,
Enforcement Attorney

cc: James C. Freeman, President
Chemical Recovery Systems, Inc.

Ken Schultz
Ohio Environmental Protection
Agency

Robert Buker
Ohio State Fire Marshals' Office

bcc: Fred Stiebt
Paul Schaeffer
Frank Byros
Leon Acierto

GPhelus:tmp:4/30/80